

To: Doherty, Paul[Doherty.Paul@epa.gov]
From: Zane Belden
Sent: Tue 9/29/2015 2:18:14 PM
Subject: D&Z - SPCC Plans

Paul,

Thanks for the feedback.

As far as your concern about the frequency of inspections: Our infrastructure on each lease is checked and inspected on a daily basis by our pumpers and we document this by our daily gauge sheets. This is where we document on a daily basis which includes who checked the facility and what time the facility is checked. Does this satisfy your concern from page 34?

We have gone through the SPCC with our pumpers and feel our training is compliant. Again, we have been providing this training to our pumpers since we hired each of them. And this training includes the daily checks and inspections as mentioned above. We will be documenting this in our new SPCC plans and going over it with them on a periodic basis as outlined in the plan.

I do have questions about the "line testing" which I am also asking our consultant about. Exactly how do companies typically perform this? We do this by checking pressures at different points along our lines to be sure we never have pressures that approach the max operating pressure of the flowline. Is this something we need to periodically document in the new SPCC plan to satisfy this requirement?

Thanks, Zane

Zane/Deke:

I've completed an initial review of the Meyers Lease SPCC plan and find no other significant deficiencies.

I am concerned that only annual area supervisor's inspections will be documented. (Page 34 indicates inspections by the supervisor are at least every 6 months and pumper inspections are more frequent.) We recommend that documented periodic inspections be more frequent than once a year.

I'm ok with allowing D&Z 30 days to complete the initial training and inspection, including line pressure testing, called for by the SPCC. Let me know when this work is completed and I'll schedule an onsite inspection. If you don't anticipate being able to complete the training/inspections within this timeframe we can schedule the SPCC inspection without delay. If you have records of equivalent training, inspections, including line pressure testing please forward the information for our consideration prior to the upcoming inspection.

Thanks for your cooperation. Any questions let me know.

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